

March 18, 2015

Honorable A. Kathleen Tomlinson
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

**Re: Randy A. Hoskins a/k/a Randy White v. County
of Nassau, et al.**
Civil Action No.: CV-14-4722 (SJF) (AKT)
LJAA File No.: 0153.1321.0000

Dear Judge Tomlinson:

This firm represents the County of Nassau, the Nassau County Police Department, and the Nassau County Sheriff's Department in the above-referenced litigation. This letter is sent in response to Your Honor's Order of today's date. As an initial matter, I apologize for misunderstanding Your Honor's ruling at the March 5 conference, and for any inconvenience that misunderstanding may have caused.

The Nassau County Police Department Internal Affairs Unit has completed its investigation, and its report, concerning the events at issue in this litigation.

My office now has in its possession a copy of the complete Internal Affairs Unit file, including the above referenced report. Pursuant to Your Honor's directive at the March 5, 2015 conference, the Internal Affairs Unit file will be produced to the parties in this litigation, as soon as each of the parties has executed a Confidentiality Agreement.

On the afternoon of March 5, 2015, a draft confidentiality agreement was emailed to Counsel for all parties, along with a request for their comments and/or execution. As of the date of this letter, my office has not received any response from Counsel. Under separate cover, a copy of the draft confidentiality agreement is being redistributed to all Counsel today, along with a request for comments and/or execution by the parties.

Mark R. Aledort
Robert J. Avallone
Deborah A. Aviles
Daniel A. Bartoldus
Amy E. Bedell
Karen M. Berberich
Claudia L. Boyd
Anne M. Bracken
Dylan C. Braverman
Brian Brown
Jorja C. Carr
Joseph M. Charchalis
Anthony J. Chiofalo
Robert J. Cimino
Michael T. Colavecchio
Robert M. D'Angelillo
Thomas J. Dargan
Rebecca K. Devlin
Meaghan A. Dolce
Robert W. Doyle, Jr.
Rose M. Feeney
David W. Fink
Carl A. Formicola
Jennifer M. Frankola
Lawrence J. Freeze
Stacey E. Gorny
Brian J. Greenwood
John J. Halleron III
Christine B. Hickey
Tara M. Higgins
Caroline K. Hock
John E. Horan
Jeffrey D. Hummel
Frederick C. Johs
Annemarie S. Jones
Ann K. Kandel
Jason T. Katz
Jessica Klotz
Bryan F. Lewis
William J. Lewis
Eileen H. Libutti
Robert A. Lifson
Judith N. Littman
Raymond M. Loew
Edward G. Lukoski
Daniel W. McCally
Kevin G. Mescall
David L. Metzger
Michael Milchan
Greg M. Mondelli
James F. Murphy
Michael J. Murphy
Teresa M. Myers
Amy S. Pincus
Jeffrey M. Pincus
Thomas A. Rhatigan
F. Sean Rooney
Martin K. Rowe
Julie C. Ruggieri
John B. Saville
Ellen N. Savin
Theresa Scotto-Lavino
Matthew D. Shwom
Adam H. Silverstone
Paul R. Varriale
Kenneth F. Whitman
Robert J. Yenchman

*Randy A. Hoskins a/k/a Randy White v. County
of Nassau, et al.
March 18, 2015
Page 2*

LEWIS JOHS
Lewis Johs Avallone Aviles, LLP
Counsellors at Law

Thank you for your consideration.

Very truly yours,



Daniel A. Bartoldus
dabartoldus@lewisjohs.com
Islandia Office
DAB/ja

cc via ECF:

LAW OFFICES OF FREDERICK K. BREWINGTON
Attn.: Frederick K. Brewington
Attorneys for Plaintiff

REBORE, THORPE & PISARELLO, P.C.
Attn.: Brian A. A'Hearn, Esq.
Attorneys for Defendant
Sergeant Sal Mistretta

WHITE, QUINLAN & STALEY, LLP
Attn.: Michael Butler, Esq.
Attorneys for Defendant
Gary Melius

LEAHEY & JOHNSON, P.C.
Attn.: Peter James Johnson, Jr., Esq. &
Christopher D. Clark, Esq.
Attorneys for Defendant
Commissioner of Police Thomas Dale

THE PASCARELLA LAW FIRM, PLLC
Attn.: James Pascarella, Esq.
Attorneys for Defendant
John Capece